

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
CONNECTICUT, NEW JERSEY,
RHODE ISLAND and WASHINGTON,
and COMMONWEALTHS OF
MASSACHUSETTS and VIRGINIA,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE; and JEFFERSON B.
SESSIONS III, in his official capacity as
Attorney General of the United States,

Defendants.

No. 18-cv-6471 (ER)

CITY OF NEW YORK

Plaintiff,

v.

JEFFERSON B. SESSIONS III, in his
official capacity as Attorney General of
the United States of America, and the
UNITED STATES DEPARTMENT OF
JUSTICE,

Defendants.

No. 18-cv-6474 (ER)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Declarations of Nancy Trasande, Meryl Holt, Michael Charles Green, William G. Kelly Jr., Lovely A. Warren, Michael P. Lawlor, Jennifer E. Fradel, Chia-Chia Wang, Michael J. Hogan, Diane Klontz, Adrian Diaz, Richard Torrance, Daniel

J. Bennett, Shannon Dion, Marcos Soler, Kim Y. Royster, Laura Negrón, Candice Cho, and Mary Travis Bassett, with attached exhibits; the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Partial Summary Judgment; and Plaintiffs' Local Civil Rule 56.1 Statement of Material Undisputed Facts, all dated August 17, 2018, Plaintiffs in matter 18-cv-6471, the States of New York, Connecticut, New Jersey, Rhode Island and Washington, and the Commonwealths of Massachusetts and Virginia, and Plaintiff in matter 18-cv-6474, the City of New York, by their attorneys, jointly move this Court before the Honorable Edgardo Ramos, United States District Court Judge in the United States District Court, Southern District of New York, Thurgood Marshall United States Courthouse, Courtroom 619, 40 Foley Square, New York, NY 10007 New York, New York, at a date and time to be determined by the Court, for an order granting partial summary judgment to Plaintiffs;

PLEASE TAKE FURTHER NOTICE that Plaintiffs request oral argument in connection with their motion; and pursuant to the agreed upon schedule so ordered by the Court (ECF No. 47), Defendants will file a combination motion to dismiss and opposition, or, alternatively, a motion for summary judgment and opposition to Plaintiffs' motion by September 14, 2018; Plaintiffs will file their opposition to the motion to dismiss/motion for summary judgment and reply in support of their motion by September 26, 2018; and Defendants will file their reply by October 8, 2018.

New York, NY
Dated: August 17, 2018

Respectfully submitted,

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* S.D.N.Y. application pending

** *Pro hac vice* motion forthcoming